

1 DANIEL G. BOGDEN
United States Attorney
2 Nevada State Bar No. 2137
DANIEL D. HOLLINGSWORTH
3 Assistant United States Attorney
Nevada State Bar No. 1925
4 Lloyd D. George United States Courthouse
333 Las Vegas Boulevard South, Suite 5000
5 Las Vegas, Nevada 89101
Telephone: (702) 388-6336
6 Facsimile: (702) 388-6787
Counsel for Plaintiff
7
8
9

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.) 2:13-CR-419-JAD-(PAL)
15 GERALD KOKOSZKA,)
16 Defendant.)

17 **THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO EXTEND THE TIME**
18 **FOR THE UNITED STATES TO RESPOND TO THE VERIFIED PETITION OF**
19 **CALIFORNIA BANK & TRUST (ECF NO. 55) AND ORDER**
(Second Request)

20 The United States of America respectfully moves this Court for an Order extending the time
21 for the United States to respond to the Verified Petition of California Bank & Trust Pursuant to Title
22 21, United States Code, Section 853(n) (ECF No. 55). The deadline for responding to the Verified
23 Petition is July 28, 2015. The United States requests an extension of time to and including August 11,
24 2015.

25 The grounds for extending the time are as follows.

26 ///

1 Shlomo S. Sherman, counsel for California Bank & Trust, was contacted on July 24, 2015,
2 and agreed to the extension.

3 The AUSA assigned to file the response to the Petition for this case has a large case load, has
4 been extremely busy addressing forfeiture within a short time frame in other cases, and was out for a
5 week because of illness.

6 This Motion is not submitted solely for the purpose of delay or for any other improper
7 purpose.

8 This Court should grant an extension of time to, and including, August 11, 2015, for the
9 United States to respond to the Verified Petition of California Bank & Trust pursuant to Title 21,
10 United States Code, Section 853(n) (ECF No. 55).

11 DATED this 24th day of July, 2015.

12 DANIEL G. BOGDEN
13 United States Attorney

14
15 /s/ Daniel D. Hollingsworth
16 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

17
18 IT IS SO ORDERED:
19

20
21 
22 UNITED STATES DISTRICT JUDGE

23 DATED: July 24, 2015
24
25
26